

EXHIBIT B

Letter from L. Schapira to R. Cook (April 30, 2012)

DECLARATION OF ROBERT N. COOK

Rockwell Automation v. WAGO Corporation, Case No.3:10CV00718-WMC (W.D. Wis.)

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April 30, 2012

BY EMAIL (bob@wcc-ip.com)

Robert Cook, Esq.
Whitham, Curtis, Christofferson & Cook, P.C.
11491 Sunset Hills Road, Suite 340
Reston, VA 20190

Re: Rockwell Automation et al. v. WAGO Corp. et al. (W.D. Wis.)

Dear Bob,

Pursuant to the April 20, 2012 hearing before Magistrate Judge Crocker the parties agreed to submit to the court a list of outstanding deficiencies with respect to WCP's and WKT's (collectively, the "Defendants") document production by May 1, 2012. To that end, today we had a phone call to discuss the Defendants' production. The purpose of this letter is to confirm our understanding regarding Defendants' production and clarify where there is still a gap in the parties' understanding as to what needs to be produced in response to Rockwell's discovery requests. I have identified my understanding of your representations from today's call. Please let me know immediately, but not later than 11:00 a.m. tomorrow, if any of the statements below are inaccurate so that we may accurately characterize the parties' positions in our submission to the Court.

1. Defendants' have searched both electronic and hard copy documents, including email, that are in the possession, custody and control of Defendants for documents responsive to Rockwell's 89 document requests as well as the document requests that accompanied the three 30(b)(6) deposition notices (the "Requests").
2. Defendants have produced all English language documents, including all emails, that are responsive to the Requests except for WCP's databases that aggregate financial and product information.
3. Defendants have no documents that predate the filing of the complaint that are responsive to the Requests that are being withheld on the grounds of privilege.
4. Defendants have not withheld any English language documents that are responsive to any document request or deposition notice based on any confidentiality or privacy concerns.

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5. Defendants have produced all emails between WKT and WCP responsive to each of the Requests, which includes any emails relating to any features and functions of Defendants' programmable controllers and related software.
6. Defendants have produced all communications with Kontron, 3S, and customers that are responsive to the Requests, including communications related to any features and functions of Defendants' programmable controllers and related software.¹
7. Defendants have produced all documents that served as the source of information to any interrogatory response or that are related to any of the issues raised in the 17 interrogatories propounded by Rockwell, except for the databases containing financial and products information.
8. Defendants are in the process of reviewing German language documents, but were unable to provide an estimate as to the volume of review or an expected date for production of such documents.

Lastly, during our call, I informed you that Defendants' document production was not searchable. Rule 34(E) of the Federal Rules of Civil Procedure requires the production of electronically stored information, like email, to be produced in the form in which it is maintained. Defendants' documents were not produced in accordance with Rule 34. For example, email was not produced with field information permitting Rockwell to search by sender. As soon as possible please provide the last production in the proper, searchable format. Such a format might include ASCII delimited format, with the OCR text as the last field, and with the fieldnames in the first row of the ascii file. Please let me know when you expect this to be accomplished.

Very truly yours,

/s/ Lisa Schapira

¹ To the extent Defendants did not believe that the Requests called for the production of communications with third parties relating to any features or functions of Defendants' programmable controllers and software, we direct Defendants' attention to Document Request Nos. 79-89.